

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

L.A., by and through her Guardian MAURICE ANDREWS, individually and on behalf of all similarly situated individuals,

Plaintiff,

v.

TAKE-TWO INTERACTIVE SOFTWARE, INC., a Delaware corporation,

Defendant.

Case No. 3:22-cv-50071

**DEFENDANT TAKE-TWO INTERACTIVE SOFTWARE, INC.’S
UNOPPOSED MOTION FOR INITIAL EXTENSION OF TIME TO RESPOND
TO CLASS ACTION COMPLAINT & JURY DEMAND**

Defendant Take-Two Interactive Software, Inc. (“Take-Two”), by its undersigned attorneys, hereby respectfully moves this Court for a 30-day extension of time, to and including April 4, 2022, to answer, move, or otherwise respond to the Class Action Complaint & Jury Demand (the “Complaint”) filed by Plaintiff L.A., by and through her Guardian Maurice Andrews’ (“Plaintiff”). In support of its motion, Take-Two states the following:

1. The Complaint was filed on January 11, 2022 in the Circuit Court of the Seventeenth Judicial Circuit, Winnebago County, Illinois.
2. Take-Two removed the Complaint to the United States District Court for the Northern District of Illinois (Eastern Division) on February 25, 2022 by the filing of the Notice of Removal. *See* Dkt. 1.
3. The case was transferred from this Court’s Eastern Division to the Western Division on March 1, 2022. *See* Dkt. 8-10.

4. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), Take-Two's deadline to answer, move or otherwise respond to the Complaint is March 4, 2022. Fed. R. Civ. P. 81(c).

5. Take-Two requests a 30-day extension to allow it sufficient time to analyze Plaintiff's factual allegations, assess her claims, and prepare a response.

6. This is Take-Two's first request for an extension of the responsive pleading deadline.

7. Take-Two's counsel corresponded with Plaintiff's counsel regarding the requested extension, who confirmed that Plaintiff does not oppose a 30-day extension of time for Take-Two to respond to the Complaint.

8. Prior to the transfer of this action from this Court's Eastern Division to the Western, Judge Robert M. Dow, Jr. granted Take-Two's unopposed motion for a 30-day extension of the responsive pleading deadline. Dkt. 7.

WHEREFORE, for the foregoing reasons, Take-Two respectfully requests that the Court grant Take-Two an extension of time, to and including April 4, 2022, answer, move or otherwise respond to the Complaint.

Dated: March 3, 2022

Respectfully submitted,

KELLEY DRYE & WARREN LLP

By: /s/Matthew Luzadder

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